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10
11 *Counsel for Richard A. Marshack, Liquidation
12 Trustee of the LPG Liquidation Trust*

13
14 **UNITED STATES BANKRUPTCY COURT**

15 **CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION**

16 In re

17 The Litigation Practice Group P.C.,
18 Debtor.

19 Case No. 8:23-bk-10571-SC

20 Chapter 11

21 **STIPULATION MODIFYING
22 MEDIATION AND SETTLEMENT
23 CONFERENCE REQUIREMENT
24 CONCERNING EARN-OUT DISPUTE**

25 Judge: Hon. Scott C. Clarkson
26 Date: [No Hearing Required]
27 Time: [No Hearing Required]
28 Place: Courtroom 5C
 411 W. Fourth Street
 Santa Ana, CA 92701

29
30 Richard A. Marshack, Liquidation Trustee of the LPG Liquidating Trust (the “Trustee”), on
31 the one hand, and Morning Law Group P.C. (“MLG”), (MLG and Trustee, taken together, the
32 “Parties”), on the other hand, hereby enter into this stipulation (“Stipulation”).

33 **RECITALS**

34 A. On April 21, 2025, the Court entered an order [Docket No. 2397] (the “Stipulated
35 Order”) approving a stipulation [Docket No. 2388] that resolved certain disputes with respect to the
36 payment of undisputed amounts under the *Agreement of Purchase and Sale and Joint Escrow
37 Instructions* [Docket No. 416] (the “PSA”) by and among the Parties.

38 B. Pursuant to the stipulation and Stipulated Order, the Parties desired and agreed to

1 participate in a one-day mediation or settlement conference regarding the Earn-Out Dispute (as
2 defined in the Stipulated Order) not later than July 1, 2025. The Parties further agreed to participate
3 in informal discovery in advance of such mediation or settlement conference, which has yet to take
4 place as of the date of this Stipulation.

5 C. On June 13, 2025, Todd C. Ringstad, Esq. of Ringstad & Sanders LLP substituted
6 [Docket No. 2444] in as counsel to MLG. Since the substitution, the Parties have been in discussions
7 concerning alternative approaches to resolution of the Earn-Out Dispute. Additionally, Mr. Ringstad
8 requires a reasonable time to familiarize himself with the issues related to the Earn-Out Dispute.

9 D. Based on the foregoing, the Parties believe that the interests of efficient management
10 of the Earn-Out Dispute and related informal settlement discussions counsel in favor of holding the
11 settlement conference or mediation deadline in abeyance, and, based thereon, agree to enter into this
12 Stipulation.

13 **STIPULATION**

14 The Parties hereby stipulate and agree as follows:

15 1. The foregoing recitals are incorporated herein by this reference.
16 2. The Parties agree to modify the Stipulated Order solely to waive the requirement that
17 the Parties participate in mediation or settlement conference related to the Earn-Out Dispute no later
18 than July 1, 2025.

19 3. This Stipulation is without prejudice to either or both Parties seeking a further order
20 from the Court concerning mediation of the Earn-Out Dispute.

21 *[The remainder of this page is intentionally blank.]*

1 4. All other terms of the Stipulated Order shall remain in full force and effect.
2

3 DATED: June 26, 2025

FOX ROTHSCHILD LLP

4 By: */s/ Nicholas A. Koffroth*
5

6 KEITH C. OWENS
7 NICHOLAS A. KOFFROTH
8 *Attorneys for Richard A. Marshack, Liquidation*
9 *Trustee of the LPG Liquidating Trust*

10 DATED: June 26, 2025

RINGSTAD & SANDERS LLP

11 By: *Todd Ringstad*

12 TODD C. RINGSTAD
13 *Attorneys for Morning Law Group P.C.*

1 PROOF OF SERVICE OF DOCUMENT

2 I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business
3 address is 10250 Constellation Boulevard, Suite 900, Los Angeles, CA 90067.

4 A true and correct copy of the foregoing documents entitled: STIPULATION MODIFYING
5 MEDIATION AND SETTLEMENT CONFERENCE REQUIREMENT CONCERNING EARN-OUT
6 DISPUTE on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the
7 manner stated below:

8 **1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant
9 to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and
10 hyperlink to the document. On 6/26/2025, I checked the CM/ECF docket for this bankruptcy case or
11 adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to
12 receive NEF transmission at the email addresses stated below:

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2. **SERVED BY UNITED STATES MAIL:** On 6/26/2025, I served the following persons and/or
entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and
correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed
as follows.

21 See attached for additional parties

22 3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION
OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling
23 LBR, on 6/26/2025, I served the following persons and/or entities by personal delivery, mail service, or (for
24 those who consented in writing to such service method), by facsimile transmission and/or email as follows.
25 Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will
be completed no later than 24 hours after the document is filed.

26 The Honorable Scott C. Clarkson
27 United States Bankruptcy Court, Central District of California
28 411 West Fourth Street, Suite 5130 / Courtroom 5C
 Santa Ana, CA 92701-4593

1 I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

2 6/26/2025

3 Date

Kimberly Hoang

Printed Name

/s/ Kimberly Hoang

Signature

6 **Additional Parties Served by U.S. Mail**

7 **Creditors who have the 20 largest unsecured claims**

8 Debt Validation Fund II, LLC
5075 Lower Valley Road,
9 Atglen, PA 19310

10 MC DVI Fund 1, LLC; MC
DVI Fund 2, LLC
11 598 Cottonwood Dr.,
Glenview, IL 60026

12 Validation Partners LLC
1300 Sawgrass Pkwy, Ste. 110
13 Sunrise, FL 33323

14 Marich Bein LLC
15 99 Wall Street, Ste 2669
New York, NY 10005

16 Business Centers of America
17 1100 Sir Francis Drake Blvd,
Ste 1, Kentfield, CA 94904

18 JP Morgan Chase
19 3 Park Plaza, Ste 900
Irvine, CA 92614

20 CA Franchise Tax Board
21 PO Box 942857
Sacramento, CA 94257-0511

22 Outsource Accelerator Ltd
23 City Marque Limited
24 Unit 8801-2 Bldg. 244-248
Des Voeux Rd.
Central Hong Kong

25 Collaboration Advisors
400 Dorla Court
26 Zephyr Cove, NV 89448

28 Anthem Blue Cross
PO Box 511300
Los Angeles, CA 90051-7855

1 Azevedo Solutions Groups, Inc.
2 420 Adobe Canyon Rd.
3 Kenwood, CA 95452

4 Debt Pay Pro
5 1900 E Golf Road, Suite 550
6 Schaumburg, IL 60173

7 Sharp Business Systems
8 8670 Argent St
9 Santee, CA 92071

10 Tustin Executive Center
11 1630 S Sunkist Street, Ste A
12 Anaheim, CA 92806

13 Exela Enterprise Solutions
14 2701 E. Grauwyler Road
15 Irving, TX 75061

16 Netsuite-Oracle
17 2300 Oracle Way
18 Austin, TX 78741

19 Credit Reporting Service Inc
20 548 Market St, Suite 72907
21 San Francisco, CA 94104-5401

22 Document Fulfillment Services
23 2930 Ramona Ave #100
24 Sacramento, CA 95826

25 Executive Center LLC
26 5960 South Jones Blvd
27 Las Vegas, NV 89118

28 LexisNexus
15500 B Rockfield Blvd
Irvine, CA 92618

22 **Secured Creditors**

23 Diverse Capital LLC
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24 Sunny Isles, FL 33154

25 City Capital NY
1135 Kane Concourse
26 Bay Harbour Islands, FL 33154